

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

YOUSSEFF GENID AND LINDA GENID,

Plaintiffs,

v.

**FANNIE MAE, SETERUS, FEDERAL
HOUSING FINANCE AGENCY, JOHN
DOES 1-10 (names being fictitious and
unknown)**

Defendants.

CASE NO.

JUDGE

COMPLAINT

(with Jury Demand)

Now come Plaintiffs Yousseff Genid and Linda Genid, by and through counsel, and hereby state as follows for their Complaint against Defendant Wells Fargo Bank, National Association, d.b.a. America's Servicing Company:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiffs Youssef Genid and Linda Genid ("Plaintiffs" or the "Genids") own real property located at and commonly known as 212 Edison Road, Barnegat, County of Ocean and State of New Jersey (the "Property").
2. Defendant Fannie Mae ("Defendant") is the current servicer of a note (the "Note") and a mortgage on the Property that allegedly secures the Note (the "Mortgage") (collectively referred to hereinafter as the "Loan").
3. This Court has jurisdiction pursuant to 28 U.S.C. §1331 as this action arises under the Dodd-Frank Wall Street Reform and Consumer Protection Act (DFA), the Real Estate Settlement Procedures Act, 12 U.S.C. §§ 2601, *et seq.* (RESPA) and the Truth in Lending Act, 15 U.S.C. §§1601, *et seq.* (TILA) and the New Jersey Consumer Fraud Act.

4. This action is specifically filed to enforce regulations promulgated by the Consumer Finance Protection Bureau that became effective on January 10, 2014, specifically, 12 C.F.R. §1024.41 of Regulation X.
5. This Court has supplemental jurisdiction to hear all state law claims pursuant to 28 U.S.C. §1367.
6. Venue lies in this District pursuant to 28 U.S.C. §1391(b) as Plaintiffs maintain the Property as Plaintiffs' primary residence.

INTRODUCTION

1. On June 4th, 2015, the undersigned requested information pursuant to 12 CFR Section 1024.35 of Regulation X of the Mortgage Servicing Act under RESPA, which Regulation became effective on January 10, 2014, including, but not limited to, the Fannie Mae Repurchase program. This program gives homeowners an opportunity to repurchase their properties after sheriff's sales at or about the market value. Details about this program are not readily available and therefore a request for information was submitted. Said letter was acknowledge timely, however, more than 69 days have gone by without proper response.

2. On June 12th, 2015 the undersigned received correspondence essentially stating that Seterus was still in the process of reviewing the issues presented, and that "upon completion of your research" a written explanation would be sent. Seterus failed to advise of a completion date. In this letter, Seterus identified Fannie Mae (Federal National Mortgage Association) as the owner of the loan. Thereafter, on July 21, 2015 we received correspondence from Seterus that stated that the inquiry was still being reviewed and more time was needed to complete it, again with no promised date of completion.

3. On July 29, 2015, the plaintiff, Mr. Genid stating that the Ocean County Sheriff's department had posted an eviction notice which is tentatively set for August 18, 2015. Multiple pieces of correspondence was transmitted to Seterus and Seterus' counsel regarding the Fannie Mae repurchase program, without response. Additionally, a recent call to Seterus did not divulge the fact that an eviction was imminent. Instead of responding to the request for information as the defendants were required to do, they moved forward expeditiously with an eviction process not notifying plaintiff's counsel.

4. On July 21, 2015 correspondence was received from Seterus, stating that any inquiries should be directed to Fannie Mae directly. This information could have been provided timely and much sooner. Additionally, Seterus is still acting as agent to Fannie Mae on the eviction process. The law firm handing the eviction for Fannie Mae is technically retained by Seterus therefore it is inaccurate to state that Seterus no longer is involved in this case. Mr. Genid has been damaged by Seterus' delay. Seterus' advice, after months of correspondence and other follow-up to direct the inquiry to Fannie Mae, is inappropriate and smacks of bad faith. All the correspondence issued by the undersigned was addressed to Phelan, Hallinan, Diamond & Jones, counsel for plaintiff and its servicer. Therefore, Fannie Mae through its legal representative also received the correspondence. Therefore Fannie Mae, had a duty to respond to our correspondence through its agent, Phelan, Hallinan, Diamond & Jones as well as it's servicer Seterus. Plaintiff, since May, was aware of our representation and did not notice us at all with respect to the eviction.

5. The plaintiff and Fannie Mae are in continued violation of the aforementioned Federal Regulation. The program we inquired about does, in fact, exist and is potentially a way for Mr. and Mrs. Genid to save their property. Plaintiff and Fannie Mae's non-compliance with the inquiry demonstrates a lack of knowledge about a program which is meant for homeowners who

have lost their homes to a foreclosure sale, an opportunity to repurchase the home. Not being aware of this mechanism and not providing any access to this program enabling Mr. and Mrs. Genid to buy-back their home is a deceptive and misleading business practice. Since this repurchase program is only available to homeowners post sheriff's sale, a rush to evict them before having given them an opportunity to inquire about the program, apply and then get an appropriate final decision on whether they are eligible or not also violated their due process rights. This is at a minimum an unfair business practice actionable under the New Jersey Consumer Fraud Act.

FACTS COMMON TO ALL PARTIES

7. Plaintiffs restate and incorporate herein all of their statements and allegations contained in the preceding paragraphs in their entirety, as if fully rewritten herein.
8. In January 2013, the Consumer Financial Protection Bureau (CFPB) issued a number of final rules concerning mortgage markets in the United States, pursuant to the DFA, Public Law No. 111-203, 124 Stat. 1376 (2010).
9. Specifically, on January 17, 2013, the CFPB issued the Real Estate Settlement Procedures Act (Regulation X) and the Truth in Lending Act (Regulation Z) Mortgage Servicing Final Rules, 78 F.R. 10901 (February 14, 2013) and 78 F.R. 10695 (Regulation X) (February 14, 2013), which became effective on January 10, 2014.
10. The Loan in the instant matter is a "federally related mortgage loan" as said term is defined by 12 C.F.R. §1024.2(b).
11. Defendant is subject to the aforesaid Regulations and does not qualify for the exception for "small servicers" as such term is defined in 12 C.F.R. §1026.41(e)(4), nor the exemption for a "qualified lender" as such term is defined in 12 C.F.R. §617.700.

12. Plaintiffs are asserting a claim for relief against Defendant for breach of the specific rules under Regulation X as set forth below.
13. Plaintiffs have a private right of action under RESPA pursuant to 12 U.S.C. §2605(f) for the claimed breaches and such action provides for remedies including actual damages, costs, statutory damages, and attorneys' fees.

BACKGROUND

14. Plaintiffs restate and incorporate herein all of their statements and allegations contained in the preceding paragraphs in their entirety, as if fully rewritten herein.
15. On or about April 8, 2015, Plaintiffs, by and through their Joseph A. Chang & Associates, LLC ("JAC & Ass."), submitted On or about April 8th, 2015, written correspondence to Defendant Seterus, Inc., via Certified U.S. Mail [Tracking Number: 7014 2120 0000 8916 4609] received 4-18-15, captioned *Request for information pursuant to Regulation X, 12 CFR Sec. 1024.36(d)(@)(i)B*. A true and accurate copy of NOE #1 is attached hereto as *Plaintiff's Exhibit A*. Additionally, Seterus' agent was served the Law firm Phelan, Hallinan & Diamond. via Certified U.S. Mail [Tracking Number: 7014 2120 0000 8916 4579] received 4-16-15. (Here various information with respect to loan modification was requested.)
16. On or about April 8, 2015, Plaintiffs, by and through their Joseph A. Chang & Associates, LLC ("JAC & Ass."), submitted On or about April 8th, 2015, written correspondence to Defendant Seterus, Inc., via Certified U.S. Mail [Tracking Number: 7014 2120 0000 8916 4616] received 4-16-15, Notice of Error pursuant to RESPA Regulation X, 12CFR Section 1024.35 (e)(3)(i)(B)). A true and accurate copy of NOE #1 is attached hereto as *Plaintiff's Exhibit B*. Additionally, Seterus' agent was served the Law firm Phelan, Hallinan &

Diamond. via Certified U.S. Mail [Tracking Number: 7014 2120 0000 8916 4562] received 4-16-15. (Here various information with respect to loan modification was requested..

17. The correspondence referred to in paragraphs 18 and 19 were not acknowledged as required by Regulations X and Z. Additionally, a response was not received within the 30 day deadline in violation of regulations X and Z. Additionally, a request for additional time was not received by the Plaintiff in violation of Regulations X and Z.
18. On or about May 27, 2015, Plaintiffs, by and through their Joseph A. Chang & Associates, LLC ("JAC & Ass."), received correspondence purporting to respond to letters received by Seterus, Inc. on April 14 and April 16, 2015. This response was inaccurate, specifically with respect to Seterus' false statement that "Even if we are able to approve a foreclosure alternative prior to a sale, a court with jurisdiction over the foreclosure proceeding, or the public official charged with carrying out the sale, may not halt the scheduled sale. Sales can be in fact put off up until the Sheriff sales actually occurs. The statement that the Ocean County Sheriff's department would not adjourn the sale is false, misleading and completely inaccurate.
19. On or about June 4^h, 2015, written correspondence to Defendant Seterus, Inc., via Certified U.S. Mail [Tracking Number: 7014 2870 0000 4788 9948] received June 8, 2015, Request for information pursuant to RESPA Regulation X, 12CFR Section 1024.36 (d)(2)(i)(B)). A true and accurate copy of the document is attached hereto as *Plaintiff's Exhibit D*. Additionally, Seterus' and Fannie Mae's agent was served the Law firm Phelan, Hallinan & Diamond. via Certified U.S. Mail [Tracking Number: 7014 2870 0000 4788 9931] received June 9, 2015. A copy of the printout of the "Product & Tracking Information" from www.usps.com is attached hereto as *Plaintiffs' Exhibit D*. Here, several specific

questions regarding a Federal Housing Finance Agency program that permits homeowners to repurchase their property sold in a foreclosure sale at market value. The lack of response was deliberate since there were emails inquiring about the program, with zero response regarding the inquiry.

20. Defendant Seterus, sent correspondence, dated June 12, 2015, acknowledging receipt of the RFI referred to in Paragraph 22. A true and accurate copy of Acknowledgment #1 is attached hereto as *Plaintiff's Exhibit E. Here Seterus confirms they are in the process of reviewing the issues presented. Here, there is confirmation that Fannie Mae is the owner of this loan and that Fannie Mae has contracted with Seterus to service and response to inquiries about the loan..*
21. On or before July 12, 2015 no further correspondence was received from Seterus regarding the inquiry described in paragraph 22. Pursuant to Regulations X and Z a response was due by this date. Instead of diligently responding to the questions presented, Defendant Fannie Mae and Seterus decided to move forward with a Sheriff's eviction without providing counsel any notice.
22. To date, neither Plaintiffs nor Joseph Chang & Associates have received any proper written response to the RFI referred to in paragraph 22.
23. Plaintiff sent correspondence to from Defendant Seterus dated July 21st, 2015. *Plaintiffs' Exhibit F. Here, Seterus asserts that it needs more time to complete a response to the RFI para 22..*
24. Defendant received correspondence from Defendant Seterus dated July 21st, 2015. *Plaintiffs' Exhibit F. Here, Seterus asserts that it needs more time to complete a response to the RFI para 22.*

25. Defendant sent correspondence, dated October 31, 2014, acknowledging receipt of NOE #2 (“Acknowledgment #2”),

COUNT ONE:
VIOLATION OF 12 C.F.R. § 1024.35(e)

(Failure to Properly Respond to Error Noticed Pursuant to 12 C.F.R. §1024.35(b)(9))

26. Plaintiffs restate and incorporate herein all of their statements and allegations contained in the preceding paragraphs in their entirety, as if fully rewritten herein.
27. 12 C.F.R. §1024.35(e)(1) provides that a servicer must respond to a notice of error by either “[c]orrecting the error or errors identified by the borrower and providing the borrower with a written notification of the correction, the effective date of the correction, and contact information, including a telephone number, for further assistance” or “[c]onducting a reasonable investigation and providing the borrower with a written notification that includes a statement that the servicer has determined that no error occurred, a statement of the reason or reasons for this determination, a statement of the borrower's right to request documents relied upon by the servicer in reaching its determination, information regarding how the borrower can request such documents, and contact information, including a telephone number, for further assistance.”
28. Defendant’s actions in failing to properly respond to the error noticed by and through NOE #1 constitute a clear, distinct, and willful violation of 12 C.F.R. §1024.35(e).
29. Defendant’s actions are believed to be a pattern and practice of behavior in conscious disregard for Plaintiff’s rights.
30. As a result of Defendant’s actions, Defendant is liable to Plaintiffs for actual damages, statutory damages, costs, and attorneys’ fees.

COUNT TWO:

VIOLATION OF THE NEW JERSEY CONSUMER FRAUD ACT

31. Plaintiffs restate and incorporate herein all of their statements and allegations contained in the preceding paragraphs in their entirety, as if fully rewritten herein.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that this Court enter its order granting judgment for the following:

- A.) To enter a preliminary injunction preventing the Defendant from moving forward with an aspect of the pending foreclosure case until the Plaintiffs are allowed to pursue all loss mitigation rights;
- B.) For actual damages, costs, and reasonable attorney fees;
- C.) For statutory damages of no less than \$2,000.00 as to each and every count;
- D.) Such other relief which this Court may deem appropriate.

JOSEPH A. CHANG & ASSOCIATES, LLC
Attorneys for Plaintiffs

DATED: September 10, 2015

BY: *S/ JOSEPH A. CHANG*

Joseph A. Chang
A Member of the Firm
jc@josephchangelaw.com

JURY DEMAND

Plaintiffs hereby request a trial by jury on all issues, with the maximum number of jurors permitted by law.

DATED: September 10, 2015

s/ JOSEPH A. CHANG

Joseph A. Chang
A Member of the Firm

EXHIBIT A

JOSEPH A. CHANG & ASSOCIATES, L.L.C.
ATTORNEYS AT LAW

JOSEPH A. CHANG *
JC@JOSEPHCHANGLAW.COM

MICHAEL A. CASSATA *
MC@JOSEPHCHANGLAW.COM

JOSEPH M. BIMONTE *
JB@JOSEPHCHANGLAW.COM



♦ CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY

* ADMITTED NY/NJ

951 Madison Avenue, Paterson, New Jersey 07501
Tel. (973) 925-2525 • Fax (973) 925-9090

■ Please respond to
Paterson Office

Park 80 West, Plaza II, 250 Pehle Avenue, Suite 200
Saddle Brook, New Jersey 07663
www.josephchanglaw.com

April 8, 2015

VIA REGULAR AND CERTIFIED MAIL

Seterus, Inc.
ATTN: Borrower Inquiry Department
PO Box 2008
Grand Rapids, MI 49501-2008

Re: Youssef Genid
Address: 212 Edison Rd.
Barnegat, NJ 08005
Account No.: 26433999

To Whom It May Concern:

Please be advised that I represent Mr. Youssef Genid with respect to the mortgage loan you are servicing on the property located at 212 Edison Rd. My clients have authorized me to send this request on their behalf (see Authorization below). As servicer of my client's mortgage loan, please treat this as a "request for information" pursuant to the Real Estate Settlement Procedures Act, subject to the response period set out in Regulation X, 12 C.F.R. § 1024.36(d)(2)(i)(B).

Specifically, I am requesting the following information for the period beginning when account went into default until your receipt of this request (the "applicable period"):

1. Identify and briefly describe all loss mitigation options that were available to my clients from the owner or assignee of my clients' mortgage loan.
2. Provide any notices sent to my clients advising them of the availability of loss mitigation options.
3. For each loss mitigation application you have received from my clients during the applicable period, identify the following:
 - a. the date it was received;
 - b. the date you sent my clients an acknowledgment of receipt of the application;
 - c. the date you determined it was complete; and

- d. a description of your evaluation of it, including your determination of which loss mitigation options were or were not offered to my clients.
4. If any loss mitigation application you received from my clients is currently under review and is considered to be incomplete, provide a list of the additional documents and information my clients must submit to make the application complete, as well as any applicable deadline for returning such documents.
5. Identify any other documents or information not under the control of my clients needed to make the application complete.
6. [For loan modification denial based on investor restrictions] If you have determined that a loan modification option is not available to my clients because of a requirement or restriction imposed by the owner or assignee of my clients' mortgage loan, provide the following:
 - a. a description of the requirement or restriction and the identity of the owner or assignee, including the name of any applicable trusts and trustees;
 - b. the document, or provision within the document, that contains the requirement or restriction, and information identifying the document sufficient to locate the document if it is publicly available;
 - c. a description of your actions to seek a waiver of the requirement or restriction;
 - d. any documents relating to your efforts to seek a waiver of the requirement or restriction, and whether such waiver request was approved or denied;
 - e. any summary information created or retained by you pertaining to loan modifications available to my clients and investor restrictions applicable to my clients' loan or loans pooled with this loan; and
 - f. any guidance provided to you by the owner or assignee pertaining to modifications applicable to my clients' loan.
7. [For loan modification denial based on NPV] If you have determined that a loan modification option is not available to my clients because of a net present value calculation, provide:
 - a. the inputs used for the calculation; and
 - b. the date the calculation was done.
8. [For loan modification denial based on excessive principal forbearance] If you have determined that a loan modification option is not available to my clients because of excessive principal forbearance, provide the figures used in reaching this determination, including the current unpaid principal balance, value of the property, gross monthly income, and monthly escrow payment.
9. [For FHA loan modification denial] If you have determined that a loan modification option is not available to my clients, provide the figures and calculations used in reaching this determination, including the gross monthly income, monthly escrow payment,

interest arrears, any other fees or charges to be capitalized, current unpaid principal balance, unpaid principal balance as of the date of any previous partial claim, and amount of any previous partial claim.

10. If you have determined that a loan modification option is not available to my clients for any other reason(s), describe in detail the reason(s) for denial and provide documentation of any reason(s) for denial.
11. Provide any notices or documents you sent to my clients in relation to loss mitigation of my clients' loan during the applicable period, including:
 - a. any notices acknowledging receipt of any loss mitigation application from them and stating whether the application was complete or incomplete;
 - b. any notices stating the outcome of your evaluation of their application;
 - c. any proposed written agreement that offered a loss mitigation option to my clients;
 - d. any written agreement signed by my clients that provided for a loss mitigation option; and
 - e. any notices stating the outcome of their appeal of your denial of a loan modification option.
12. You initiated a foreclosure proceeding against my clients during the applicable period, identify or provide the following:
 - a. the date the matter was referred to your attorney to begin the legal foreclosure process;
 - b. the date you or your attorney made the first notice or filing to begin the foreclosure process, and a description of the actions taken;
 - c. a listing of any dispositive motions filed and the date filed;
 - d. any steps taken to schedule the foreclosure sale, and the date those steps were taken;
 - e. the date of any scheduled or rescheduled foreclosure sale; and
 - f. any notices sent to my clients about the foreclosure of their mortgage loan.
13. Provide any appraisal, broker's price opinion, automated valuation model analysis, or other assessment of the value of the property securing my clients' mortgage loan that you obtained during the applicable period.
14. Provide any notes or logs created by your personnel reflecting communications with my clients about their request for loss mitigation assistance or about their default on the loan during the applicable period.

Thank you for taking the time to respond to this request for information.

Best regards,
JOSEPH A. CHANG & ASSOCIATES, LLC

Joseph A. Chang, Esq.

cc: **VIA REGULAR & CERTIFIED MAIL**
JP Morgan Chase
P.O. Box 183166
Columbus, OH 43218

cc: **VIA REGULAR & CERTIFIED MAIL**
Phelan, Hallinan & Diamond, PC
400 Fellowship Road
Mt. Laurel, NJ 08054

7014 2120 0000 8916 4609

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
HereATTN: Borrower
Inquiry Dept.**NG & ASSOCIATES, L.L.C.****ORNEYS AT LAW**
 § CERTIFIED BY THE SUPREME COURT OF
 NEW JERSEY AS A CIVIL TRIAL ATTORNEY

* ADMITTED NY/NJ

 nue, Paterson, New Jersey 07501
 5-2525 • Fax (973) 925-9090

 ■ Please respond to
 Paterson Office

 aza II, 250 Pehle Avenue, Suite 200
 Brook, New Jersey 07663
josephchanglaw.com

April 8, 2015

Sent To	Seterus, Inc.
Street & Apt. No., or PO Box No.	PO Box 2008
City, State, ZIP+4	Grand Rapids, MI 49501

PS Form 3800, July 2014

See Reverse for Instructions

VIA REGULAR AND CERTIFIED MAIL

Seterus, Inc.

ATTN: Borrower Inquiry Department

PO Box 2008

7014 2120 0000 8916 4593

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To	J.P. Morgan Chase
Street & Apt. No., or PO Box No.	PO Box 183166
City, State, ZIP+4	Columbus, OH 43218

PS Form 3800, July 2014

See Reverse for Instructions

went into default until your receipt of this request (the "applicable period"):

usef Genid with respect to the mortgage loan you are
 ison Rd. My clients have authorized me to send this
 elow). As servicer of my client's mortgage loan,
 n" pursuant to the Real Estate Settlement Procedures
 n Regulation X, 12 C.F.R. § 1024.36(d)(2)(i)(B).

information for the period beginning when account

mitigation options that were available to my clients
 ients' mortgage loan.

its advising them of the availability of loss mitigation

you have received from my clients during the
 wing:

an acknowledgment of receipt of the application;
 as complete; and

7014 2120 0000 8916 4579

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To	Phelan Hallinan & Berman
Street & Apt. No., or PO Box No.	400 Fellowship Rd.
City, State, ZIP+4	Mt. Laurel, NJ 08054

PS Form 3800, July 2014

See Reverse for Instructions

- d. a description of your evaluation of it, including your determination of which loss mitigation options were or were not offered to my clients.
4. If any loss mitigation application you received from my clients is currently under review and is considered to be incomplete, provide a list of the additional documents and information my clients must submit to make the application complete, as well as any applicable deadline for returning such documents.
5. Identify any other documents or information not under the control of my clients needed to make the application complete.
6. [For loan modification denial based on investor restrictions] If you have determined that a loan modification option is not available to my clients because of a requirement or restriction imposed by the owner or assignee of my clients' mortgage loan, provide the following:
 - a. a description of the requirement or restriction and the identity of the owner or assignee, including the name of any applicable trusts and trustees;
 - b. the document, or provision within the document, that contains the requirement or restriction, and information identifying the document sufficient to locate the document if it is publicly available;
 - c. a description of your actions to seek a waiver of the requirement or restriction;
 - d. any documents relating to your efforts to seek a waiver of the requirement or restriction, and whether such waiver request was approved or denied;
 - e. any summary information created or retained by you pertaining to loan modifications available to my clients and investor restrictions applicable to my clients' loan or loans pooled with this loan; and
 - f. any guidance provided to you by the owner or assignee pertaining to modifications applicable to my clients' loan.
7. [For loan modification denial based on NPV] If you have determined that a loan modification option is not available to my clients because of a net present value calculation, provide:
 - a. the inputs used for the calculation; and
 - b. the date the calculation was done.
8. [For loan modification denial based on excessive principal forbearance] If you have determined that a loan modification option is not available to my clients because of excessive principal forbearance, provide the figures used in reaching this determination, including the current unpaid principal balance, value of the property, gross monthly income, and monthly escrow payment.
9. [For FHA loan modification denial] If you have determined that a loan modification option is not available to my clients, provide the figures and calculations used in reaching this determination, including the gross monthly income, monthly escrow payment,

interest arrears, any other fees or charges to be capitalized, current unpaid principal balance, unpaid principal balance as of the date of any previous partial claim, and amount of any previous partial claim.

10. If you have determined that a loan modification option is not available to my clients for any other reason(s), describe in detail the reason(s) for denial and provide documentation of any reason(s) for denial.
11. Provide any notices or documents you sent to my clients in relation to loss mitigation of my clients' loan during the applicable period, including:
 - a. any notices acknowledging receipt of any loss mitigation application from them and stating whether the application was complete or incomplete;
 - b. any notices stating the outcome of your evaluation of their application;
 - c. any proposed written agreement that offered a loss mitigation option to my clients;
 - d. any written agreement signed by my clients that provided for a loss mitigation option; and
 - e. any notices stating the outcome of their appeal of your denial of a loan modification option.
12. You initiated a foreclosure proceeding against my clients during the applicable period, identify or provide the following:
 - a. the date the matter was referred to your attorney to begin the legal foreclosure process;
 - b. the date you or your attorney made the first notice or filing to begin the foreclosure process, and a description of the actions taken;
 - c. a listing of any dispositive motions filed and the date filed;
 - d. any steps taken to schedule the foreclosure sale, and the date those steps were taken;
 - e. the date of any scheduled or rescheduled foreclosure sale; and
 - f. any notices sent to my clients about the foreclosure of their mortgage loan.
13. Provide any appraisal, broker's price opinion, automated valuation model analysis, or other assessment of the value of the property securing my clients' mortgage loan that you obtained during the applicable period.
14. Provide any notes or logs created by your personnel reflecting communications with my clients about their request for loss mitigation assistance or about their default on the loan during the applicable period.

Thank you for taking the time to respond to this request for information.

Best regards,
JOSEPH A. CHANG & ASSOCIATES, LLC



Joseph A. Chang, Esq.

cc: VIA REGULAR & CERTIFIED MAIL
JP Morgan Chase
P.O. Box 183166
Columbus, OH 43218

cc: VIA REGULAR & CERTIFIED MAIL
Phelan, Hallinan & Diamond, PC
400 Fellowship Road
Mt. Laurel, NJ 08054

JOSEPH A. CHANG & ASSOCIATES, L.L.C.
ATTORNEYS AT LAW

JOSEPH A. CHANG
JC@JOSEPHCHANGLAW.COM

MICHAELA A. CASSATA
MAC@JOSEPHCHANGLAW.COM

* ADMITTED NY/NJ
* CERTIFIED CIVIL TRIAL ATTORNEY



951 Madison Avenue, Paterson, New Jersey 07501
Tel. (973) 925-2525 Fax (973) 925-9090
www.josephchanglaw.com

JOSEPH M. BIMONTE
JB@JOSEPHCHANGLAW.COM

AUTHORIZATION TO RELEASE INFORMATION

Date: April 21, 2014

Borrower: Youssef Genid Last 4 of Soc. Sec# 0317

Co-Borrower: _____ Last 4 of Soc. Sec# _____

Address: 212 Edison Road, Bamegat NJ 08005

Lender: Seferus

Loan No. 26433999

Please be advised that this office is working with the above clients on a plan to resolve his/her mortgage delinquency. They hereby authorize you to release any and all information concerning his/her account to the Joseph A. Chang & Associates, L.L.C. at their request.

They further authorize you to discuss their case with all employees from Joseph A. Chang & Associates L.L.C. Our office is working to help them address their financial problems and to propose a loss mitigation plan which is within your guidelines.

You may release additional information to Joseph A. Chang & Associates, L.L.C. in the future without further authorization.

This authorization has no expiration and can only be revoked in writing.

Thank you for taking the time to deal with this request.

Client

04/21/2014
Dated

Client

04/21/2014
Dated

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

JP Morgan Chase
PO Box 183166
Columbus, OH 43218

2. Article Number

(Transfer from service label)

7014 2120 0000 8916 4593

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Address

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No
 Chase
 340 S. Cleveland Ave
 Columbus, OH 43215

3. Service Type

- ☒ Certified Mail® ☐ Priority Mail Express™
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Setchus, Inc.
ATTN: Borrower Inquiry Dept.
PO Box 2008
Grand Rapids, MI 49501

2. Article Number

(Transfer from service label)

7014 2120 0000 8916 4609

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Address

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

- ☒ Certified Mail® ☐ Priority Mail Express™
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Phelan Hallinan & Diamond
400 Fellowship Rd.
Mt. Laurel, NJ 08054

2. Article Number

(Transfer from service label)

7014 2120 0000 8916 4579

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☒ Agent
☐ Address

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

- ☒ Certified Mail® ☐ Priority Mail Express™
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes

EXHIBIT B

JOSEPH A. CHANG & ASSOCIATES, L.L.C.
ATTORNEYS AT LAW

JOSEPH A. CHANG *
JC@JOSEPHCHANGLAW.COM

MICHAEL A. CASSATA ♦
MC@JOSEPHCHANGLAW.COM

JOSEPH M. BIMONTE *
JB@JOSEPHCHANGLAW.COM



♦ CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY

* ADMITTED NY/NJ

951 Madison Avenue, Paterson, New Jersey 07501
Tel. (973) 925-2525 • Fax (973) 925-9090

■ Please respond to
Paterson Office

Park 80 West, Plaza II, 250 Pehle Avenue, Suite 200
Saddle Brook, New Jersey 07663
www.josephchangelaw.com

April 8, 2015

VIA REGULAR AND CERTIFIED MAIL

Seterus, Inc.
ATTN: Borrower Inquiry Department
PO Box 2008
Grand Rapids, MI 49501-2008

Re: Youssef Genid
Address: 212 Edison Rd.
Barnegat, NJ 08005
Account No.: 26433999

To Whom It May Concern:

Please be advised that I represent Mr. Youssef Genid with respect to the mortgage loan you are servicing on the property located at 212 Edison Rd. My clients have authorized me to send this request on their behalf (see Authorization below). As servicer of my client's mortgage loan, please treat this as a "notice of error" pursuant to the Real Estate Settlement Procedures Act, subject to the response period set out in Regulation X, 12 C.F.R. § 1024.35(e)(3)(i)(B).

In 2010, 2011 and 2013 my clients submitted to you a complete loss mitigation application. This complete application was received by you more than thirty-seven days before the foreclosure sale you scheduled on their home. However, between 2011 and 2015 the law firm representing you in the foreclosure proceeding moved for the entry of default, a foreclosure judgment, a writ of execution, and a sheriff's sale. Please see the following timeline of events in regard to efforts our firm took to submit a complete loan modification application:

Date	Action Taken
August 25, 2014	Sent modification application to lender (Seterus) via facsimile: (877) 971-7799
September 2, 2014	Sent hard copy of modification application to lender via FedEx.
September 16, 2014	Documents requested by lender. Emailed borrower.

October 8, 2014	Sent second email to borrower requesting documents.
November 11, 2014	Sent third email to borrower requesting K-1's.
December 11, 2014	Submitted documents requested by lender.
December 17, 2014	Documents requested by lender.
December 31, 2014	Emailed borrower and told to contact borrower's accountant.
February 2, 2015	Received email from lender's attorney that the file had been closed out of loss mitigation. No denial letter or chance to appeal.
March 6, 2015	Received documents from client. Some documents were missing.
April 3, 2015	Completed loan modification application and submitted to lender.
April 6, 2015	Called lender to confirm receipt of application. Lender informed our office that they might adjourn the Sheriff's Sale. Our office was told to call back.
April 6, 2015	Called lender and was informed that the application was incomplete. Informed lender that the application was not incomplete. He immediately said he found the remaining items but that he would not adjourn the Sheriff's Sale.

This action was taken even though my clients have not received a notice pursuant to Regulation X, 12 C.F.R. § 1024.41(c)(1)(ii) stating the outcome of your evaluation of their application; or prior to the time my clients' appeals rights expired; or even though my clients have not received a notice pursuant to Regulation X, 12 C.F.R. § 1024.41(h)(4) stating the outcome of their appeal of your denial of a loan modification option, in violation of Regulation X, 12 C.F.R. § 1024.41(g).

To correct this error, you should immediately instruct the law firm representing you in the foreclosure proceeding to take all necessary actions to vacate the sheriff's sale that occurred April 7, 2015.

A foreclosure sale occurred in violation of Regulation X, 12 C.F.R. § 1024.41(g), the borrowers reserve the right to pursue remedies available under 12 U.S.C. § 2605(f). See § 9.2.10, supra.

Thank you for taking the time to respond to this notice of error.

Best regards,
JOSEPH A. CHANG & ASSOCIATES, LLC

Joseph A. Chang, Esq.

cc: **VIA REGULAR & CERTIFIED MAIL**
JP Morgan Chase
P.O. Box 183166
Columbus, OH 43218

cc: **VIA REGULAR & CERTIFIED MAIL**
Phelan, Hallinan & Diamond, PC
400 Fellowship Road
Mt. Laurel, NJ 08054

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

ATTN: Borrower
Inquiry Dept.



IG & ASSOCIATES, L.L.C.
 ORNEYS AT LAW

♦ CERTIFIED BY THE SUPREME COURT OF
 NEW JERSEY AS A CIVIL TRIAL ATTORNEY

* ADMITTED NY/NJ

nue, Paterson, New Jersey 07501
 5-2525* Fax (973) 925-9090

■ Please respond to
 Paterson Office

Sent To Seterus, Inc.
 Street & Apt. No.,
 or PO Box No. PO BOX 2008
 City, State, ZIP+4 Grand Rapids MI 49501
 PS Form 3800, July 2014 See Reverse for Instructions

iza II, 250 Pehle Avenue, Suite 200
 brook, New Jersey 07663
josephchanglaw.com

pril 8, 2015

VIA REGULAR AND CERTIFIED MAIL

Seterus, Inc.

ATTN: Borrower Inquiry Department

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To JP Morgan Chase
 Street & Apt. No.,
 or PO Box No. PO BOX 183166
 City, State, ZIP+4 Columbus, OH 43218
 PS Form 3800, July 2014 See Reverse for Instructions

sses Genid with respect to the mortgage loan you are
 ison Rd. My clients have authorized me to send this
 below). As servicer of my client's mortgage loan,
 want to the Real Estate Settlement Procedures Act,
 gulation X, 12 C.F.R. § 1024.35(e)(3)(i)(B).

ed to you a complete loss mitigation application. This
 more than thirty-seven days before the foreclosure
 sale you scheduled on their home. However, between 2011 and 2015 the law firm representing
 you in the foreclosure proceeding moved for the entry of default, a foreclosure judgment, a writ
 e the following timeline of events in regard to efforts
 idification application:

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To Phelan Hallinan Diamond
 Street & Apt. No.,
 or PO Box No. 400 Fellowship Rd.
 City, State, ZIP+4 Mt. Laurel, NJ 08054
 PS Form 3800, July 2014 See Reverse for Instructions

Action Taken

Sent modification application to
 lender (Seterus) via facsimile:
 (877) 971-7799

Sent hard copy of modification
 application to lender via FedEx.

Documents requested by lender.
 Emailed borrower.

October 8, 2014	Sent second email to borrower requesting documents.
November 11, 2014	Sent third email to borrower requesting K-1's.
December 11, 2014	Submitted documents requested by lender.
December 17, 2014	Documents requested by lender.
December 31, 2014	Emailed borrower and told to contact borrower's accountant.
February 2, 2015	Received email from lender's attorney that the file had been closed out of loss mitigation. No denial letter or chance to appeal.
March 6, 2015	Received documents from client. Some documents were missing.
April 3, 2015	Completed loan modification application and submitted to lender.
April 6, 2015	Called lender to confirm receipt of application. Lender informed our office that they might adjourn the Sheriff's Sale. Our office was told to call back.
April 6, 2015	Called lender and was informed that the application was incomplete. Informed lender that the application was not incomplete. He immediately said he found the remaining items but that he would not adjourn the Sheriff's Sale.

This action was taken even though my clients have not received a notice pursuant to Regulation X, 12 C.F.R. § 1024.41(c)(1)(ii) stating the outcome of your evaluation of their application; or prior to the time my clients' appeals rights expired; or even though my clients have not received a notice pursuant to Regulation X, 12 C.F.R. § 1024.41(h)(4) stating the outcome of their appeal of your denial of a loan modification option, in violation of Regulation X, 12 C.F.R. § 1024.41(g).


To correct this error, you should immediately instruct the law firm representing you in the foreclosure proceeding to take all necessary actions to vacate the sheriff's sale that occurred April 7, 2015.

A foreclosure sale occurred in violation of Regulation X, 12 C.F.R. § 1024.41(g), the borrowers reserve the right to pursue remedies available under 12 U.S.C. § 2605(f). See § 9.2.10, *supra*.

Thank you for taking the time to respond to this notice of error.

Best regards,

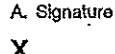
JOSEPH A. CHANG & ASSOCIATES, LLC

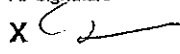
A handwritten signature in black ink, appearing to read 'Joseph A. Chang', is written over the printed name.

Joseph A. Chang, Esq.

cc: VIA REGULAR & CERTIFIED MAIL
JP Morgan Chase
P.O. Box 183166
Columbus, OH 43218

cc: VIA REGULAR & CERTIFIED MAIL
Phelan, Hallinan & Diamond, PC
400 Fellowship Road
Mt. Laurel, NJ 08054

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		A. Signature X  <input type="checkbox"/> Agent <input type="checkbox"/> Address	
1. Article Addressed to: JP Morgan Chase PO Box 183166 Columbus, OH 43218		B. Received by (Printed Name) Chase C. Date of Delivery APR 17 2015 D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No 340 S. Cleveland Ave Columbus, OH 43218	
2. Article Number (Transfer from service label) 7014 2120 0000 8916 4586		3. Service Type <input checked="" type="checkbox"/> Certified Mail* <input type="checkbox"/> Priority Mail Express <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
PS Form 3811, July 2013 Domestic Return Receipt			

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		A. Signature X  <input type="checkbox"/> Agent <input type="checkbox"/> Address	
1. Article Addressed to: Setchus, Inc. ATTN: Borrower Inquiry Dept PO Box 2008 Grand Rapids MI 49501		B. Received by (Printed Name) C. Date of Delivery APR 16 2015 D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
2. Article Number (Transfer from service label) 7014 2120 0000 8916 4616		3. Service Type <input checked="" type="checkbox"/> Certified Mail* <input type="checkbox"/> Priority Mail Express <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
PS Form 3811, July 2013 Domestic Return Receipt			


SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		A. Signature X  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to: Phelan, Hallinan & Diamond 400 Fellowship Rd. Mt. Laurel NJ 08054		B. Received by (Printed Name) Michael DeBenedictis C. Date of Delivery 4-16-15 D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
2. Article Number (Transfer from service label) 7014 2120 0000 8916 4562		3. Service Type <input checked="" type="checkbox"/> Certified Mail* <input type="checkbox"/> Priority Mail Express <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
PS Form 3811, July 2013 Domestic Return Receipt			

EXHIBIT C

seterusTM

PO Box 2008, Grand Rapids, MI 49501-2008

FedEx 2Day delivery

Joseph A. Chang
Attorney at Law
951 Madison Ave.
Paterson, NJ 07501

Business Hours (Pacific Time)
Monday-Thursday 5 a.m. to 8 p.m.
Friday 5 a.m. to 6 p.m.

Physical Address
14523 SW Millikan Way, Suite 200, Beaverton, OR 97005

Payments
PO Box 54420, Los Angeles, CA 90054-0420

Correspondence
PO Box 2008, Grand Rapids, MI 49501-2008

Phone: 866.570.5277
Fax: 866.578.5277
www.seterus.com

May 27, 2015
Borrower: Youssef Genid

Dear Mr. Chang:

On behalf of Seterus, Inc., I am responding to correspondence received April 14 and 16, 2015 regarding the above-referenced borrower.

Your client's loan 26433999 transferred to us from Chase on March 1, 2014 delinquent for the September 1, 2009 and all subsequent installments. Foreclosure proceedings were initiated by us on March 8, 2014.

Since transfer, we have sent offers of possible assistance to your client on March 12, March 16, and March 27, 2014, and May 12, 2014. Copies of these offers are enclosed for your review. We began receiving financial documentation from your client on August 27, 2014. At that time, the loan was in active litigation. Additional documentation was received on September 2 and 4, 2014.

A review of the documentation received, was completed on September 8, 2014, and it was determined at that time, that we did not have all of the documentation required to do a complete review the loan for assistance. As you state in your correspondence, the additional documentation was requested by us on September 16, 2014. Your correspondence indicates that additional documentation was sent to us on December 11, 2014. However, no additional documentation was received until April 6, 2015, one day before the foreclosure sale for this loan.

Only when the full Borrower Response Package is received, with all documents valid and up-to-date, may we begin reviewing the loan for assistance options. Please note that a Net Present Value was not completed as we did not begin a review of this loan due to the incomplete Borrower Response Package.

The foreclosure sale date was scheduled for April 7, 2015. If a complete Borrower Response Package is submitted less than 37 calendar days before a scheduled foreclosure sale, there is no guarantee we can evaluate the loan for a foreclosure alternative in time to stop the foreclosure sale. Even if we are able to approve a foreclosure alternative prior to a sale, a court with jurisdiction over the foreclosure proceeding, or the public official charged with carrying out the sale, may not halt the scheduled sale.

(Continued)

THIS COMMUNICATION IS FROM A DEBT COLLECTOR AS WE SOMETIMES ACT AS A DEBT COLLECTOR. WE ARE ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. HOWEVER, IF YOU ARE IN BANKRUPTCY OR RECEIVED A BANKRUPTCY DISCHARGE OF THIS DEBT, THIS LETTER IS NOT AN ATTEMPT TO COLLECT THE DEBT. THIS NOTICE IS BEING FURNISHED FOR YOUR INFORMATION AND TO COMPLY WITH APPLICABLE LAWS AND REGULATIONS. IF YOU RECEIVE OR HAVE RECEIVED A DISCHARGE OF THIS DEBT THAT IS NOT REAFFIRMED IN A BANKRUPTCY PROCEEDING, YOU WILL NOT BE PERSONALLY RESPONSIBLE FOR THE DEBT. COLORADO: SEE WWW.COLORADOATTORNEYGENERAL.GOV/CA FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT. Seterus, Inc. maintains a local office at 355 Union Boulevard, Suite 250, Lakewood, CO 80228. The office's phone number is 888.738.5576. NEW YORK CITY: 1411669, 1411665, 1411662. TENNESSEE: This collection agency is licensed by the Collection Service Board of the Department of Commerce and Insurance. Seterus, Inc. is licensed to do business at 14523 SW Millikan Way, Beaverton, OR.

Joseph A. Chang
Attorney at Law
May 27, 2015
Borrower: Youssef Genid

A foreclosure sale was completed as scheduled on April 7, 2015.

Seterus offers prepayment plans, forbearance agreements, and loan modifications for borrowers who qualify for these options. Seterus also offers short sales and Mortgage Releases (Deed-In-Lieu of Foreclosure), again for borrowers who qualify for these programs.

Enclosed per your request are copies of any notices,/motions filed, hold or postponements, and/or notices sent to you or your client were sent regarding the foreclosure action.

Also enclosed are copies of all valuations we have on file for the loan.

If you have any questions, please contact our customer service department at our toll-free number above.

Sincerely,



Katie West
Correspondence Response Team
Seterus, Inc.

Enclosures

EXHIBIT D

JOSEPH A. CHANG & ASSOCIATES, L.L.C.
ATTORNEYS AT LAW

JOSEPH A. CHANG *
JC@JOSEPHCHANGLAW.COM

MICHAEL A. CASSATA ♦
MC@JOSEPHCHANGLAW.COM

JOSEPH M. BIMONTE *
JB@JOSEPHCHANGLAW.COM



♦ CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY

* ADMITTED NY/NJ

951 Madison Avenue, Paterson, New Jersey 07501
Tel. (973) 925-2525 • Fax (973) 925-9090

■ Please respond to
Paterson Office

Park 80 West, Plaza II, 250 Pehle Avenue, Suite 200
Saddle Brook, New Jersey 07663
www.josephchanglaw.com

June 4, 2015

VIA REGULAR AND CERTIFIED MAIL

Seterus, Inc.
ATTN: Borrower Inquiry Department
PO Box 2008
Grand Rapids, MI 49501-2008

Re: Youssef Genid
Address: 212 Edison Rd.
Barneгат, NJ 08005
Account No.: 26433999

To Whom It May Concern:

Please be advised that I represent Mr. Youssef Genid with respect to the mortgage loan you are servicing on the property located at 212 Edison Rd. My clients have authorized me to send this request on their behalf (see Authorization below).

As servicer of my client's mortgage loan, please treat this as a "request for information" pursuant to the Real Estate Settlement Procedures Act, subject to the response period set out in Regulation X, 12 C.F.R. § 1024.36(d)(2)(i)(B). Specifically, I am requesting the following information:

1. What is the name of the directive/program in the announcement from November 25, 2014 regarding repurchasing REO Fannie/Freddie properties?
2. On November 25, 2014, the Federal Housing Finance Agency (FHFA) announced a change to its policy relating to sales of existing REO properties. The change permits Fannie Mae to sell existing REO properties to any qualified purchaser at fair-market value. Does this change in policy apply to this loan? And if so please provide any information relating to procedures that exist in order to participate and/or apply for this program.
3. Where are the written directives, guidelines for the announced program? Please provide them.
4. What or who is responsible for oversight and decision-making in the announced directive?

5. Can FHA or HUD provide financing?
6. What are the eligibility requirements for this program?
7. Are there any other programs that give people who lost their homes to foreclosure eligibility to repurchase those properties back at current market value if their loans were back by Fannie Mae or Freddie Mac.
8. What are the notice to borrower requirements of any of these repurchase programs, if any?
9. Is this loan eligible for the Fannie Mae repurchase program?
10. Are there any post-foreclosure sale solutions available to the borrower on this loan.

Thank you for taking the time to respond to this request for information.

Best regards,
JOSEPH A. CHANG & ASSOCIATES, LLC

/s/ Joseph A. Chang

JAC/so

Joseph A. Chang, Esq.

cc: VIA REGULAR & CERTIFIED MAIL
JP Morgan Chase
P.O. Box 183166
Columbus, OH 43218

cc: VIA REGULAR & CERTIFIED MAIL
Phelan, Hallinan & Diamond, PC
400 Fellowship Road
Mt. Laurel, NJ 08054

7014 2870 0000 4788 9948

U.S. Postal Service[®]	
CERTIFIED MAIL[®] RECEIPT	
Domestic Mail Only	
For delivery information, visit our website at www.usps.com .	
OFFICIAL USE	
Postage \$	Postmark Here <i>sephenus Inc.</i>
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Sent To <i>ATTN: Borrower Inquiry Department</i>	
Street & Apt. No., or PO Box No. <i>PO Box 2608</i>	
City, State, ZIP+4 <i>Grand Rapids, MI 49501</i>	
PS Form 3800, July 2014 See Reverse for Instructions	

G & ASSOCIATES, L.L.C.
ATTORNEYS AT LAW



◇ CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY

* ADMITTED NY/NJ

Paterson, New Jersey 07501
2525 Fax (973) 925-9090

■ Please respond to
Paterson Office

250 Pehle Avenue, Suite 200
Paterson, New Jersey 07663
sephenuslaw.com

September 4, 2015

VIA REGULAR AND CERTIFIED MAIL

7014 2870 0000 4788 9955

U.S. Postal Service[®]	
CERTIFIED MAIL[®] RECEIPT	
Domestic Mail Only	
For delivery information, visit our website at www.usps.com .	
OFFICIAL USE	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Sent To <i>J.P. Morgan Chase</i>	
Street & Apt. No., or PO Box No. <i>PO Box 183106</i>	
City, State, ZIP+4 <i>Columbus, OH 43216</i>	
PS Form 3800, July 2014 See Reverse for Instructions	

Respectfully, I am writing to you regarding the mortgage loan you are currently servicing on 1000 N. Rd. My clients have authorized me to send this letter to you.

For my client's mortgage loan, please treat this as a "request for information" pursuant to the Real Estate Settlement Procedures Act, subject to the response period set out in Regulation X, 12 C.F.R. § 1024.36(d)(2)(i)(B). Specifically, I am requesting the following information:

1. What program in the announcement from November 25, 2014, regarding Freddie Mac's REO properties?

2. What program in the announcement from November 25, 2014, regarding Freddie Mac's REO properties? The change permits existing REO properties. The change permits existing REO properties to any qualified purchaser at fair-market value. And if so please provide any information that exists in order to participate and/or apply for this program?

3. What are the lines for the announced program? Please provide the details of the program.

4. What is the role of the announced program in the announced program?

7014 2870 0000 4788 9931

U.S. Postal Service[®]	
CERTIFIED MAIL[®] RECEIPT	
Domestic Mail Only	
For delivery information, visit our website at www.usps.com .	
OFFICIAL USE	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Sent To <i>Phelan, Hallinan & Diamond, P.C.</i>	
Street & Apt. No., or PO Box No. <i>400 Fellowship Rd</i>	
City, State, ZIP+4 <i>Mt. Laurel, NJ 08054</i>	
PS Form 3800, July 2014 See Reverse for Instructions	

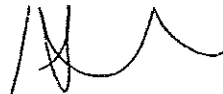
5. Can FHA or HUD provide financing?
6. What are the eligibility requirements for this program?
7. Are there any other programs that give people who lost their homes to foreclosure eligibility to repurchase those properties back at current market value if their loans were back by Fannie Mae or Freddie Mac.
8. What are the notice to borrower requirements of any of these repurchase programs, if any?
9. Is this loan eligible for the Fannie Mae repurchase program?
10. Are there any post-foreclosure sale solutions available to the borrower on this loan.

Thank you for taking the time to respond to this request for information.

Best regards,

JOSEPH A. CHANG & ASSOCIATES, LLC

/s/ Joseph A. Chang



Joseph A. Chang, Esq.

JAC/so

cc: VIA REGULAR & CERTIFIED MAIL
JP Morgan Chase
P.O. Box 183166
Columbus, OH 43218

cc: VIA REGULAR & CERTIFIED MAIL
Phelan, Hallinan & Diamond, PC
400 Fellowship Road
Mt. Laurel, NJ 08054

English

Customer Service

USPS Mobile

Register / Sign In



USPS Tracking®



Customer Service >
Have questions? We're here to help.



Get Easy Tracking Updates >
Sign up for My USPS.

Tracking Number: 70142870000047889931

Updated Delivery Day: Tuesday, June 9, 2015

Product & Tracking Information

Postal Product:

Features:

Certified Mail™

DATE & TIME	STATUS OF ITEM	LOCATION
June 9, 2015, 8:08 am	Delivered	MOUNT LAUREL, NJ 08054
Your item was delivered at 8:08 am on June 9, 2015 in MOUNT LAUREL, NJ 08054.		
June 9, 2015, 7:38 am	Arrived at Unit	MOUNT LAUREL, NJ 08054
June 6, 2015, 11:46 pm	Departed USPS Facility	BELLMAWR, NJ 08031
June 6, 2015, 7:50 am	Arrived at USPS Facility	BELLMAWR, NJ 08031
June 6, 2015, 1:52 am	Departed USPS Facility	KEARNY, NJ 07099
June 5, 2015, 9:49 pm	Arrived at USPS Facility	KEARNY, NJ 07099

Available Actions

Track Another Package

Tracking (or receipt) number

Track It

Manage Incoming Packages

Track all your packages from a dashboard.
No tracking numbers necessary.

Sign up for My USPS >



HELPFUL LINKS

Contact Us
Site Index
FAQs

ON ABOUT.USPS.COM

About USPS Home
Newsroom
USPS Service Updates
Forms & Publications
Government Services
Careers

OTHER USPS SITES

Business Customer Gateway
Postal Inspectors
Inspector General
Postal Explorer
National Postal Museum
Resources for Developers

LEGAL INFORMATION

Privacy Policy
Terms of Use
FOIA
No FEAR Act EEO Data

Copyright © 2015 USPS. All Rights Reserved.

Search or Enter a Tracking Number

EXHIBIT E

seterusTM

June 12, 2015

Physical Address
14523 SW Millikan Way; Suite 200; Beaverton, OR 97005

Business Hours (Pacific Time)
Monday-Thursday 5 a.m. to 8 p.m.
Friday 5 a.m. to 6 p.m.

Payments
PO Box 11790; Newark, NJ 07101-4790

Correspondence
PO Box 2008; Grand Rapids, MI 49501-2008

Phone
866.570.5277

Fax
866.578.5277

Website
www.seterus.com

090000

GENID, YOUSSEF
c/o JOSEPH BIMONTE 951 MADISON AVENUE
PATERSON, NJ 07501

L063A8.1

RE: Loan number: 26433999, serviced by Seterus, Inc.

Dear GENID, YOUSSEF:

We are in receipt of your inquiry and are in the process of reviewing the issue(s) presented. Upon completion of our research, we will send you a written explanation of the results and any actions taken.

The owner of your loan is Fannie Mae (Federal National Mortgage Association), 3900 Wisconsin Avenue NW, Washington, DC 20016-2892, 800.732.6643. Fannie Mae has contracted with us to service and respond to inquiries about your loan. Inquiries may be directed to Seterus at PO Box 2008; Grand Rapids, MI 49501-2008.

If you have any questions, please call us at 866.570.5277.

Sincerely,

Seterus, Inc.



THIS COMMUNICATION IS FROM A DEBT COLLECTOR AS WE SOMETIMES ACT AS A DEBT COLLECTOR. WE ARE ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. HOWEVER, IF YOU ARE IN BANKRUPTCY OR RECEIVED A BANKRUPTCY DISCHARGE OF THIS DEBT, THIS LETTER IS NOT AN ATTEMPT TO COLLECT THE DEBT, BUT NOTICE OF POSSIBLE ENFORCEMENT OF OUR LIEN AGAINST THE COLLATERAL PROPERTY. COLORADO: FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE WWW.COLORADOATTORNEYGENERAL.GOV/CA. Seterus, Inc. maintains a local office at 355 Union Boulevard, Suite 250, Lakewood, CO 80228. The office's phone number is 888.738.5576. NEW YORK CITY: 1411669, 1411665, 1411662. TENNESSEE: This collection agency is licensed by the Collection Service Board of the Department of Commerce and Insurance. Seterus, Inc. is licensed to do business at 14523 SW Millikan Way, Beaverton, OR.

EXHIBIT F

seterus™

PO Box 2008, Grand Rapids, MI 49501-2008

L400J

Joseph A. Change & Associates, LLC
Attn: Joseph A Chang
951 Madison Avenue
Paterson, NJ 07501

Business Hours (Pacific Time)
Monday-Thursday 5 a.m. to 8 p.m.
Friday 5 a.m. to 6 p.m.

Physical Address
14523 SW Millikan Way, Suite 200, Beaverton, OR 97005

Payments
PO Box 54420, Los Angeles, CA 90054-0420

Correspondence
PO Box 2008, Grand Rapids, MI 49501-2008

Phone: 866.570.5277
Fax: 866.578.5277
www.seterus.com

July 21, 2015
Borrower: Youssef Genid

Dear Mr. Chang:

On behalf of Seterus, Inc., I am responding to your correspondence regarding the above-referenced borrower.

We are still in the process of reviewing your request and need additional time to complete it. Once we have completed your request we will send you a written response detailing our findings.

If you have any questions, please contact our customer service department at our toll-free number above.

Sincerely,


Sarah Barbosa
Correspondence Response Team
Seterus, Inc.

EXHIBIT G

seterusTM

PO Box 2008, Grand Rapids, MI 49501-2008

L400J

Joseph A. Change & Associates, LLC
Attn: Joseph A Chang
951 Madison Avenue
Paterson, NJ 07501

Business Hours (Pacific Time)
Monday-Thursday 5 a.m. to 8 p.m.
Friday 5 a.m. to 6 p.m.

Physical Address
14523 SW Millikan Way, Suite 200, Beaverton, OR 97005

Payments
PO Box 54420, Los Angeles, CA 90054-0420

Correspondence
PO Box 2008, Grand Rapids, MI 49501-2008

Phone: 866.570.5277
Fax: 866.578.5277
www.seterus.com

July 21, 2015
Borrower: Youssef Genid

Dear Mr. Chang:

On behalf of Seterus, Inc., I am responding to your correspondence regarding the above-referenced borrower.

We are still in the process of reviewing your request and need additional time to complete it. Once we have completed your request we will send you a written response detailing our findings.

If you have any questions, please contact our customer service department at our toll-free number above.

Sincerely,


Sarah Barbosa
Correspondence Response Team
Seterus, Inc.

EXHIBIT H

JOSEPH A. CHANG & ASSOCIATES, L.L.C.
ATTORNEYS AT LAW

JOSEPH A. CHANG *
JC@JOSEPHCHANGLAW.COM

MICHAEL A. CASSATA *
MC@JOSEPHCHANGLAW.COM

JOSEPH M. BIMONTE *
JB@JOSEPHCHANGLAW.COM



♦ CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY

* ADMITTED NY/NJ

951 Madison Avenue, Paterson, New Jersey 07501
Tel. (973) 925-2525 • Fax (973) 925-9090

■ Please respond to
Paterson Office

Park 80 West, Plaza II, 250 Pehle Avenue, Suite 200
Saddle Brook, New Jersey 07663
www.josephchangelaw.com

July 31, 2015

VIA REGULAR AND CERTIFIED MAIL

Seterus, Inc.
ATTN: Borrower Inquiry Department
PO Box 2008
Grand Rapids, MI 49501-2008

Re: Youssef Genid
Address: 212 Edison Rd.
Barnegat, NJ 08005
Account No.: 26433999

To Whom It May Concern:

Please consider this letter to constitute a Notice of Error under 12 CFR Section 1024.35 of Regulation X of the Mortgage Servicing Act under RESPA, which Regulation became effective on January 10, 2014. These amendments implemented the Dodd-Frank Wall Street Reform and Consumer Protection Act provisions regarding mortgage loan servicing. Under these amendments, you must acknowledge receipt of this Notice within five (5) days thereof (excluding legal public holidays, Saturdays and Sundays) and must advise us of your responses to this notice within thirty (30) days of receipt thereof (excluding legal public holidays, Saturdays and Sundays).

Our inquiry dated June 4, 2015 was delivered via USPS on June 8, 2015 (Exhibit A). On June 12, 2015, we received an acknowledgement of inquiry and that was timely. However, we have not received any other response since that time.

Attached please find the initial Request for Information Pursuant to Section 1024.36(d)(ii)(2)(B) (Exhibit B), which should have been responded to no later than thirty (30) days (excluding legal public holidays, Saturdays and Sundays) after you received this request for information. To date, 53 days have passed since your receipt of our Request for Information. Therefore, the timeframe in which you had to respond to our inquiry has passed without any further notice resulting in an error.

Please correct all of these errors and provide us with notification of the correction, the date of the correction, and contact information for further assistance; or after conducting a reasonable investigation and providing the borrower with a notification that includes a statement that the servicer has determined that no error occurred, a statement of the reason or reasons for this determination, a statement of the borrower's right to request documents relied upon by the servicer in reaching its determination, information regarding how the borrower can request such documents, and contact information for further assistance.

Please be advised that for 60 days after receipt of a Notice of Error, you may not furnish adverse information to any consumer reporting agency regarding any payment that is the subject of the Notice of Error pursuant to § 1024.35(i).

Best regards,
JOSEPH A. CHANG & ASSOCIATES, LLC

/s/ Joseph A. Chang

Joseph A. Chang

cc: **VIA REGULAR & CERTIFIED MAIL**
JP Morgan Chase
P.O. Box 183166
Columbus, OH 43218

cc: **VIA REGULAR & CERTIFIED MAIL**
Phelan, Hallinan & Diamond, PC
400 Fellowship Road
Mt. Laurel, NJ 08054

7014 2870 0000 4915 2903

U.S. Postal Service™	
CERTIFIED MAIL® RECEIPT	
Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®.	
OFFICIAL USE	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Sent To <u>SEPHS, INC.</u>	
Street & Apt. No., or PO Box No.	
City, State, ZIP+4 <u>EVAN RAPIDS MI</u>	
PS Form 3800, July 2014 See Reverse for Instructions	

SEPHS & ASSOCIATES, L.L.C.
ATTORNEYS AT LAW



§ CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY

* ADMITTED NY/NJ

Paterson, New Jersey 07501
525• Fax (973) 925-9090

■ Please respond to
Paterson Office

11, 250 Pehle Avenue, Suite 200
Paterson, New Jersey 07663
sephschanlaw.com

7/31, 2015

VIA REGULAR AND CERTIFIED MAIL

Seterus, Inc.

ATTN: Borrower Inquiry Department

7014 2870 0000 4915 2897

U.S. Postal Service™	
CERTIFIED MAIL® RECEIPT	
Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®.	
OFFICIAL USE	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Sent To <u>Proton, Holliman</u>	
Street & Apt. No., or PO Box No.	
City, State, ZIP+4 <u>Mt. Laurel, NJ</u>	
PS Form 3800, July 2014 See Reverse for Instructions	

Saturdays and Sundays).

of Error under 12 CFR Section 1024.35 of
under RESPA, which Regulation became effective
emented the Dodd-Frank Wall Street Reform and
g mortgage loan servicing. Under these
of this Notice within five (5) days thereof
(d Sundays) and must advise us of your responses
thereof (excluding legal public holidays,

7014 2870 0000 4915 2910

U.S. Postal Service™	
CERTIFIED MAIL® RECEIPT	
Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®.	
OFFICIAL USE	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Sent To <u>J.P. Morgan Chase</u>	
Street & Apt. No., or PO Box No.	
City, State, ZIP+4 <u>Columbus, OH</u>	
PS Form 3800, July 2014 See Reverse for Instructions	

via USPS on June 8, 2015 (Exhibit A). On June
of inquiry and that was timely. However, we have
ie.

information Pursuant to Section 1024.36(d)(ii)(2)(B)
ed to no later than thirty (30) days (excluding legal
r you received this request for information. To date,
Request for Information. Therefore, the timeframe
as passed without any further notice resulting in an

Please correct all of these errors and provide us with notification of the correction, the date of the correction, and contact information for further assistance; or after conducting a reasonable investigation and providing the borrower with a notification that includes a statement that the servicer has determined that no error occurred, a statement of the reason or reasons for this determination, a statement of the borrower's right to request documents relied upon by the servicer in reaching its determination, information regarding how the borrower can request such documents, and contact information for further assistance.

Please be advised that for 60 days after receipt of a Notice of Error, you may not furnish adverse information to any consumer reporting agency regarding any payment that is the subject of the Notice of Error pursuant to § 1024.35(i).

Best regards,

JOSEPH A. CHANG & ASSOCIATES, LLC

/s/ Joseph A. Chang

Joseph A. Chang

cc: VIA REGULAR & CERTIFIED MAIL
JP Morgan Chase
P.O. Box 183166
Columbus, OH 43218

cc: VIA REGULAR & CERTIFIED MAIL
Phelan, Hallinan & Diamond, PC
400 Fellowship Road
Mt. Laurel, NJ 08054

JOSEPH A. CHANG & ASSOCIATES, L.L.C.
ATTORNEYS AT LAW

JOSEPH A. CHANG
JOSEPHCHANGLAW.COM

MICHAEL A. CUSATO
MICHAELCUSATO.COM

ADRIAN T. WATKINS
ADRIANTWATKINS.COM



951 Madison Avenue, Paterson, New Jersey 07501
Tel. (973) 945-7545 Fax (973) 945-9090
www.josephchanglaw.com

JOSEPH M. RIMONTE
JOSEPHRIMONTE.COM

AUTHORIZATION TO RELEASE INFORMATION

Date: April 21, 2014
Borrower: Youssef Genid Last 4 of Soc. Sec# 0317
Co-Borrower: _____ Last 4 of Soc. Sec# _____
Address: 212 Edison Road, Bamegat NJ 08005
Lender: Seferus
Loan No.: 26433999

Please be advised that this office is working with the above clients on a plan to resolve his/her mortgage delinquency. They hereby authorize you to release any and all information concerning his/her account to the Joseph A. Chang & Associates, L.L.C. at their request.

They further authorize you to discuss their case with all employees from Joseph A. Chang & Associates L.L.C. Our office is working to help them address their financial problems and to propose a loss mitigation plan which is within your guidelines.

You may release additional information to Joseph A. Chang & Associates, L.L.C. in the future without further authorization.

This authorization has no expiration and can only be revoked in writing.

Thank you for taking the time to deal with this request.

Client

04/21/2014
Dated

Client

04/21/2014
Dated

EXHIBIT A

U.S. Postal ServiceTM
CERTIFIED MAIL[®] RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

sephus Inc.

Sent To ATTN: Borrower Inquiry Department
PO Box 2008
Grand Rapids, MI 49501
 PS Form 3800, July 2014 See Reverse for Instructions

VIA REGULAR AND CERTIFIED MAIL

U.S. Postal ServiceTM
CERTIFIED MAIL[®] RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To JP Morgan Chase
PO Box 183166
Columbus, OH 43216
 PS Form 3800, July 2014 See Reverse for Instructions

My client's mortgage loan, please treat this as a "request for information" pursuant to the Real Estate Settlement Procedures Act, subject to the response period set out in Regulation X, 12 C.F.R. § 1024.36(d)(2)(i)(B). Specifically, I am requesting the following information:

U.S. Postal ServiceTM
CERTIFIED MAIL[®] RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To Portlan, Holliman & Diamond, PC
400 Fellowship Rd
Mt. Laurel, NJ 08054
 PS Form 3800, July 2014 See Reverse for Instructions

G & ASSOCIATES, L.L.C.
 RNEYS AT LAW



◊ CERTIFIED BY THE SUPREME COURT OF
 NEW JERSEY AS A CIVIL TRIAL ATTORNEY

* ADMITTED NY/NJ

ne, Paterson, New Jersey 07501
 2525* Fax (973) 925-9090

■ Please respond to
 Paterson Office

la II, 250 Pehle Avenue, Suite 200
 ook, New Jersey 07663
sephchanglaw.com

ie 4, 2015

f Genid with respect to the mortgage loan you are
 in Rd. My clients have authorized me to send this
 (w).

gram in the announcement from November 25, 2014
 reddie properties?

lousing Finance Agency (FHFA) announced a
 f existing REO properties. The change permits
 rties to any qualified purchaser at fair-market
 ly to this loan? And if so please provide any
 : exist in order to participate and/or apply for this

elines for the announced program? Please provide

ht and decision-making in the announced

5. Can FHA or HUD provide financing?
6. What are the eligibility requirements for this program?
7. Are there any other programs that give people who lost their homes to foreclosure eligibility to repurchase those properties back at current market value if their loans were back by Fannie Mae or Freddie Mac.
8. What are the notice to borrower requirements of any of these repurchase programs, if any?
9. Is this loan eligible for the Fannie Mae repurchase program?
10. Are there any post-foreclosure sale solutions available to the borrower on this loan.

Thank you for taking the time to respond to this request for information.

Best regards,

JOSEPH A. CHANG & ASSOCIATES, LLC

/s/ Joseph A. Chang



Joseph A. Chang, Esq.

JAC/so

cc: VIA REGULAR & CERTIFIED MAIL
JP Morgan Chase
P.O. Box 183166
Columbus, OH 43218

cc: VIA REGULAR & CERTIFIED MAIL
Phelan, Hallinan & Diamond, PC
400 Fellowship Road
Mt. Laurel, NJ 08054

7/31/2015

USPS.com® - USPS Tracking™

English

Customer Service

USPS Mobile

Register / Sign In



USPS Tracking™



Customer Service ›
Have questions? We're here to help.



Get Easy Tracking Updates ›
Sign up for My USPS.

Tracking Number: 70142870000047889931

Updated Delivery Day: Tuesday, June 9, 2015

Product & Tracking Information

Available Actions

Postal Product:

Features:
Certified Mail™

DATE & TIME	STATUS OF ITEM	LOCATION
June 9, 2015, 8:08 am	Delivered	MOUNT LAUREL, NJ 08054

Your item was delivered at 8:08 am on June 9, 2015 in MOUNT LAUREL, NJ 08054.

June 9, 2015, 7:38 am	Arrived at Unit	MOUNT LAUREL, NJ 08054
June 6, 2015, 11:46 pm	Departed USPS Facility	BELLMAWR, NJ 08031
June 6, 2015, 7:50 am	Arrived at USPS Facility	BELLMAWR, NJ 08031
June 6, 2015, 1:52 am	Departed USPS Facility	KEARNY, NJ 07099
June 5, 2015, 9:49 pm	Arrived at USPS Facility	KEARNY, NJ 07099

Tracking Number: 70142870000047889955

Updated Delivery Day: Monday, June 8, 2015

Product & Tracking Information

Available Actions

Postal Product:

Features:
Certified Mail™

DATE & TIME	STATUS OF ITEM	LOCATION
June 8, 2015, 8:20 am	Delivered	COLUMBUS, OH 43218

Your item was delivered at 8:20 am on June 8, 2015 in COLUMBUS, OH 43218.

June 8, 2015, 5:02 am	Available for Pickup	COLUMBUS, OH 43218
-----------------------	----------------------	--------------------

7/31/2015

USPS.com® - USPS Tracking™

June 8, 2015, 4:56 am	Arrived at Unit	COLUMBUS, OH 43218
June 8, 2015, 2:14 am	Departed USPS Facility	COLUMBUS, OH 43218
June 7, 2015, 9:30 am	Arrived at USPS Facility	COLUMBUS, OH 43218
June 5, 2015, 11:03 pm	Departed USPS Facility	KEARNY, NJ 07099
June 5, 2015, 9:49 pm	Arrived at USPS Facility	KEARNY, NJ 07099

Tracking Number: 70142870000047889948

Updated Delivery Day: Monday, June 8, 2015

Product & Tracking Information

Available Actions

Postal Product:

Features:
Certified Mail™

DATE & TIME	STATUS OF ITEM	LOCATION
June 8, 2015, 7:00 am	Delivered	GRAND RAPIDS, MI 49501

Your item was delivered at 7:00 am on June 8, 2015 in GRAND RAPIDS, MI 49501.

June 8, 2015, 5:31 am	Arrived at Unit	GRAND RAPIDS, MI 49501
June 7, 2015, 11:15 pm	Departed USPS Facility	GRAND RAPIDS, MI 49599
June 7, 2015, 7:45 am	Arrived at USPS Facility	GRAND RAPIDS, MI 49599
June 5, 2015, 11:04 pm	Departed USPS Facility	KEARNY, NJ 07099
June 5, 2015, 9:49 pm	Arrived at USPS Facility	KEARNY, NJ 07099

Track Another Package

Tracking (or receipt) number

Track It

Manage Incoming Packages

Track all your packages from a dashboard.
No tracking numbers necessary.

Sign up for My USPS >



HELPFUL LINKS

Contact Us
Site Index
FAQs

ON ABOUT.USPS.COM

About USPS Home
Newsroom
USPS Service Updates
Forms & Publications
Government Services
Careers

OTHER USPS SITES

Business Customer Gateway
Postal Inspectors
Inspector General
Postal Explorer
National Postal Museum
Resources for Developers

LEGAL INFORMATION

Privacy Policy
Terms of Use
FOIA
No FEAR Act EEO Data

Copyright © 2015 USPS. All Rights Reserved.

7/31/2015

USPS.com® - USPS Tracking™

Search or Enter a Tracking Number

EXHIBIT B

JOSEPH A. CHANG & ASSOCIATES, L.L.C.
ATTORNEYS AT LAW

JOSEPH A. CHANG *
JC@JOSEPHCHANGLAW.COM

MICHAEL A. CASSATA *
MC@JOSEPHCHANGLAW.COM

JOSEPH M. BIMONTE *
JB@JOSEPHCHANGLAW.COM



♦ CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY

* ADMITTED NY/NJ

951 Madison Avenue, Paterson, New Jersey 07501
Tel. (973) 925-2525* Fax (973) 925-9090

■ Please respond to
Paterson Office

Park 80 West, Plaza II, 250 Pehle Avenue, Suite 200
Saddle Brook, New Jersey 07663
www.josephchanglaw.com

June 4, 2015

VIA REGULAR AND CERTIFIED MAIL

Seterus, Inc.
ATTN: Borrower Inquiry Department
PO Box 2008
Grand Rapids, MI 49501-2008

Re: Youssef Genid
Address: 212 Edison Rd.
Barneget, NJ 08005
Account No.: 26433999

To Whom It May Concern:

Please be advised that I represent Mr. Youssef Genid with respect to the mortgage loan you are servicing on the property located at 212 Edison Rd. My clients have authorized me to send this request on their behalf (see Authorization below).

As servicer of my client's mortgage loan, please treat this as a "request for information" pursuant to the Real Estate Settlement Procedures Act, subject to the response period set out in Regulation X, 12 C.F.R. § 1024.36(d)(2)(i)(B). Specifically, I am requesting the following information:

1. What is the name of the directive/program in the announcement from November 25, 2014 regarding repurchasing REO Fannie/Freddie properties?
2. On November 25, 2014, the Federal Housing Finance Agency (FHFA) announced a change to its policy relating to sales of existing REO properties. The change permits Fannie Mae to sell existing REO properties to any qualified purchaser at fair-market value. Does this change in policy apply to this loan? And if so please provide any information relating to procedures that exist in order to participate and/or apply for this program.
3. Where are the written directives, guidelines for the announced program? Please provide them.
4. What or who is responsible for oversight and decision-making in the announced directive?

5. Can FHA or HUD provide financing?
6. What are the eligibility requirements for this program?
7. Are there any other programs that give people who lost their homes to foreclosure eligibility to repurchase those properties back at current market value if their loans were back by Fannie Mae or Freddie Mac.
8. What are the notice to borrower requirements of any of these repurchase programs, if any?
9. Is this loan eligible for the Fannie Mae repurchase program?
10. Are there any post-foreclosure sale solutions available to the borrower on this loan.

Thank you for taking the time to respond to this request for information.

Best regards,
JOSEPH A. CHANG & ASSOCIATES, LLC

/s/ Joseph A. Chang

JAC/so

Joseph A. Chang, Esq.

cc: VIA REGULAR & CERTIFIED MAIL
JP Morgan Chase
P.O. Box 183166
Columbus, OH 43218

cc: VIA REGULAR & CERTIFIED MAIL
Phelan, Hallinan & Diamond, PC
400 Fellowship Road
Mt. Laurel, NJ 08054

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Setechus, Inc.
ATTN: Borrower Inquiry Dept.
PO Box 2000
Grand Rapids, MI 49501

2. Article Number

(Transfer from service label)

7014 2870 0000 4915 2903

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Address

B. Received by (Printed Name)

C. Date of Delivery

AUG 11 2015

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail® ☐ Priority Mail Express™
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes**SENDER: COMPLETE THIS SECTION**

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

TP Morgan Chase
PO Box 103164
Columbus, OH 43210

2. Article Number

(Transfer from service label)

7014 2870 0000 4915 2910

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Address

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail® ☐ Priority Mail Express™
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes**SENDER: COMPLETE THIS SECTION**

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Phelan Hallinan & Barnard
400 Fellowship Rd.
Mt. Laurel, NJ 08054

2. Article Number

(Transfer from service label)

7014 2870 0000 4915 2897

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☒ Agent
☐ Address

B. Received by (Printed Name)

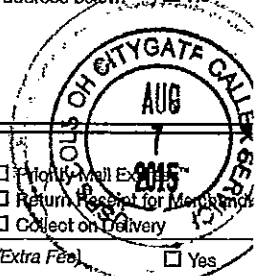
C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail® ☐ Priority Mail Express™
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes

Genid
7/31/15

Dodd Frank
RESPA
NOE